

# Exhibit 6

From: Rebecca Schindel/NYC/Cravath  
To: "Miles Coleman" <[Miles.Coleman@nelsonmullins.com](mailto:Miles.Coleman@nelsonmullins.com)>  
Cc: "bcook@scaq.gov" <[bcook@scaq.gov](mailto:bcook@scaq.gov)>, "Currey Cook" <[CCook@lambdalegal.org](mailto:CCook@lambdalegal.org)>, "Cristopher Ray" <[crav@cravath.com](mailto:crav@cravath.com)>, "Daniel Mach" <[dmach@aclu.org](mailto:dmach@aclu.org)>, "Jay Thompson" <[Jay.Thompson@nelsonmullins.com](mailto:Jay.Thompson@nelsonmullins.com)>, "kwoodington@DML-LAW.com" <[kwoodington@DML-LAW.com](mailto:kwoodington@DML-LAW.com)>, "Leslie Cooper" <[LCOOPER@aclu.org](mailto:LCOOPER@aclu.org)>, "M. Malissa Burnette" ([mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)) <[mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)>, "Mika Madgavkar" <[mmadgavkar@cravath.com](mailto:mmadgavkar@cravath.com)>, "Nekki Shutt, Esq." ([nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)) <[nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)>, "Peter Barbur" <[PBarbur@cravath.com](mailto:PBarbur@cravath.com)>, "Susan Dunn" <[sdunn@aclusc.org](mailto:sdunn@aclusc.org)>  
Date: 08/26/2020 04:25 PM  
Subject: RE: Rogers v. HHS -- Meet and Confer

---

Miles,

Those times work for us. We propose discussing the topics below. Please let us know your thoughts on this proposal and if there is anything else you would like to discuss.

**Both State Defendants**

- Completeness of productions;
- Efforts made to identify responsive documents;
- Your objections regarding conducting ESI searches;
- Your objections regarding searching for materials to the present;
- Your objections to requests seeking "documents sufficient to show";
- Your claims that no responsive documents (or no additional responsive documents) exist in response to certain requests;
- Your objections to certain requests as "irrelevant" or "disproportional" to the needs of the case;
- Your claims that certain documents are easier to obtain from Miracle Hill than the parties to the case.

**Defendant McMaster Only**

- Clarification on response to Request No. 18;
- Your objection to our seeking documents from the Office of the Governor of South Carolina;
- Your objection to producing documents that predate Governor McMaster's time as Governor.

**Defendant Leach Only**

- Clarification on responses to Request Nos. 32 and 33;
- Your objection to producing documents created before January 27, 2018;
- Your objection that a number of our document requests are identical or substantively identical to prior FOIL requests.

Regards,

Rebecca

Rebecca J. Schindel  
Cravath, Swaine & Moore LLP  
825 Eighth Avenue | New York, NY 10019  
T: (212) 474-1459  
[rschindel@cravath.com](mailto:rschindel@cravath.com)

▼ "Miles Coleman" ---08/25/2020 04:55:14 PM---Good afternoon, Rebecca. Counsel for Governor McMaster and Director Leach can speak with you togeth

From: "Miles Coleman" <[Miles.Coleman@nelsonmullins.com](mailto:Miles.Coleman@nelsonmullins.com)>  
 To: "Rebecca Schindel" <[rschindel@cravath.com](mailto:rschindel@cravath.com)>, "Jay Thompson" <[Jay.Thompson@nelsonmullins.com](mailto:Jay.Thompson@nelsonmullins.com)>, "bcook@scag.gov" <[bcook@scag.gov](mailto:bcook@scag.gov)>, "kwoodington@DML-LAW.com" <[kwoodington@DML-LAW.com](mailto:kwoodington@DML-LAW.com)>  
 Cc: "Peter Barbur" <[PBarbur@cravath.com](mailto:PBarbur@cravath.com)>, "Mika Madgavkar" <[mmadgavkar@cravath.com](mailto:mmadgavkar@cravath.com)>, "Cristopher Ray" <[cray@cravath.com](mailto:cray@cravath.com)>, "Currey Cook" <[CCook@lambdalegal.org](mailto:CCook@lambdalegal.org)>, "Leslie Cooper" <[LCOOPER@aclu.org](mailto:LCOOPER@aclu.org)>, "M. Malissa Burnette" <[mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)> <[mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)>, "Nekki Shutt, Esq." <[nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)> <[nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)>, "Susan Dunn" <[sdunn@aclusc.org](mailto:sdunn@aclusc.org)>, "Daniel Mach" <[dmach@aclu.org](mailto:dmach@aclu.org)>  
 Date: 08/25/2020 04:55 PM  
 Subject: RE: Rogers v. HHS -- Meet and Confer

External ([miles.coleman@nelsonmullins.com](mailto:miles.coleman@nelsonmullins.com))

[Report This Email](#) [FAQ](#)

Good afternoon, Rebecca. Counsel for Governor McMaster and Director Leach can speak with you together if that suits. I'm afraid we won't be able to arrange for it this week due to various scheduling conflicts, but we could be available to speak with you on Tuesday, September 1, 2020 at either 10:00 a.m. or 1:00 p.m. Please let us know if one of those times is agreeable, or, alternatively, if there is another time that day that would be preferable.

In addition, our discussion that day may be more efficient and productive if you're able to give us a preview of the matters you'd like to discuss. To the extent you're able, please let us know that subjects and positions about which you'd like to confer, and that may allow us to make substantive use of our telephone conversation next week.

Miles

 **NELSON MULLINS**  
 MILES COLEMAN PARTNER  
[miles.coleman@nelsonmullins.com](mailto:miles.coleman@nelsonmullins.com)  
 GREENVILLE ONE | SUITE 400  
 2 W. WASHINGTON STREET | GREENVILLE, SC 29601  
 T 864.373.2352 F 864.373.2925  
[NELSONMULLINS.COM](http://NELSONMULLINS.COM) [VCARD](#) [VIEW BIO](#)

**From:** Rebecca Schindel <[rschindel@cravath.com](mailto:rschindel@cravath.com)>  
**Sent:** Monday, August 24, 2020 7:14 PM  
**To:** Miles Coleman <[Miles.Coleman@nelsonmullins.com](mailto:Miles.Coleman@nelsonmullins.com)>; Jay Thompson <[Jay.Thompson@nelsonmullins.com](mailto:Jay.Thompson@nelsonmullins.com)>; [bcook@scag.gov](mailto:bcook@scag.gov); [kwoodington@DML-LAW.com](mailto:kwoodington@DML-LAW.com)  
**Cc:** Peter Barbur <[PBarbur@cravath.com](mailto:PBarbur@cravath.com)>; Mika Madgavkar <[mmadgavkar@cravath.com](mailto:mmadgavkar@cravath.com)>; Cristopher Ray <[cray@cravath.com](mailto:cray@cravath.com)>; Currey Cook <[CCook@lambdalegal.org](mailto:CCook@lambdalegal.org)>; Leslie Cooper <[LCOOPER@aclu.org](mailto:LCOOPER@aclu.org)>; M. Malissa Burnette (<[mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)> <[mburnette@burnetteshutt.law](mailto:mburnette@burnetteshutt.law)>); Nekki Shutt, Esq. (<[nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)> <[nshutt@burnetteshutt.law](mailto:nshutt@burnetteshutt.law)>); Susan Dunn <[sdunn@aclusc.org](mailto:sdunn@aclusc.org)>; Daniel Mach <[dmach@aclu.org](mailto:dmach@aclu.org)>  
**Subject:** Rogers v. HHS -- Meet and Confer

◀External Email▶ - From: [prvs=4505e67e36=rschindel@cravath.com](mailto:prvs=4505e67e36=rschindel@cravath.com)

Counsel:

We would like to schedule a meet and confer this week to discuss the State Defendants' responses and objections to Plaintiffs' First Set of RFPs. We are happy to talk as a group or to have separate meet and confers with counsel for Defendant McMaster and counsel for Defendant Leach, whichever you prefer.

We are available Wednesday other than 1-2 pm, Thursday other than 12-2 pm and anytime on Friday. Please let us know what day and time works best for you.

Regards,

Rebecca

Rebecca J. Schindel  
Cravath, Swaine & Moore LLP  
825 Eighth Avenue | New York, NY 10019  
T: (212) 474-1459  
[rschindel@cravath.com](mailto:rschindel@cravath.com)

---

This e-mail is confidential and may be privileged. Use or disclosure of it by anyone other than a designated addressee is unauthorized. If you are not an intended recipient, please delete this e-mail from the computer on which you received it.

Nelson Mullins is continuing to monitor developments related to COVID-19, including guidance from the Centers for Disease Control and various health officials; and federal, state, and local government authorities. The firm has implemented precautionary measures and plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25 geographically dispersed offices. [Click here to visit the Nelson Mullins Coronavirus Resources page.](#) Information described therein is subject to change.

### **Confidentiality Notice**

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.